

EXHIBIT B

From: Gabriel Soledad <gabrielsoledad@quinnemanuel.com>

Sent: Tuesday, September 5, 2023 4:13 PM

To: Carlos Sires <csires@bsfllp.com>

Cc: Ward, Daniel V. <Daniel.Ward@ropesgray.com>; Michael Aleo <aleo@inn-law.com>; Brooke Alexander <balexander@BSFLLP.com>; Ana Carolina Varela <Avarela@bsfllp.com>; Nicholas Hoy <nicholashoy@quinnemanuel.com>; Valerie Ramos <valerieramos@quinnemanuel.com>

Subject: RE: Discovery meet-and-confer

Carlos: We write in advance of Thursday's substantial completion deadline. For months, we have repeatedly asked your side for updates on the status of your document production. Your side has yet to get back to us or even confirm that you have successfully collected e-mails from Gayosso (which you had not yet done last we spoke). This months-long silence causes us obvious concern about SF's ability and intent to meet the upcoming discovery deadline. We once again reiterate our request that your side provide an update on your document production efforts as well as responses to the other questions below so that we can have a productive meet and confer this week.

On top of all that, your side has hamstrung AIC's own review and production. Your side has still not responded to our compromise proposal weeks ago and confirmed that we have an agreement on AIC's search protocol. Your side has also declined to agree to a standard protective order or even respond to our e-mail asking for your sign-off on an ESI protocol that we thought was no longer in dispute. Notwithstanding the above, AIC has been moving expeditiously and is in a position to meet the existing substantial completion deadline. However, AIC is not prepared to make a document production without an appropriate and enforceable protective order in place. To that end, AIC intends to shortly file a motion for entry of its proposed protective order.

Gabriel F. Soledad | Partner | **Quinn Emanuel Urquhart & Sullivan, LLP** | +1 202.538.8180